

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

MARY TROMBLEE,

Plaintiff,

v.

1:19-cv-00638-BKS-CFH

**NOTICE OF MOTION
TO COMPEL AND FOR
OTHER RELIEF**

THE STATE OF NEW YORK,
NEW YORK STATE OFFICE
FOR PEOPLE WITH DEVELOPMENTAL DISABILITIES,
et al.

Defendants.

Pursuant to Federal Rule of Civil Procedure 37, Plaintiff moves this Court to compel the production of all outstanding discovery by Defendant New York State and New York State Office for People with Developmental Disabilities (“State Defendants”) and issue sanctions in this case as described in the accompanying memorandum.

Pursuant to Local Rule 37.1, Plaintiff raised these issues in various meet and confer communications in November and December 2021. Pursuant to Local Rule 7.1(a)(2), the parties participated in a court conference held on December 21, 2021, with the Honorable Magistrate Judge Christian F. Hummel regarding the issues being presented in the motion. This motion is supported by Plaintiff’s Memorandum of Law, the Declaration of Kathryn Barcroft and all exhibits thereto, and any reply memorandum that Plaintiff may file.

WHEREFORE, Plaintiff, by and through undersigned counsel, respectfully requests that

Plaintiff's Motion to Compel be granted and State Defendants be ordered to produce all requested outstanding discovery in this matter as requested in Plaintiff's motion; be required to pay costs associated with this motion; and the Court will impose Plaintiff's requested adverse inferences.

PLEASE TAKE NOTICE, that Plaintiff herein requests the right to file and serve reply papers prior to the return date of this motion.

DATED: January 3, 2022

Albany, New York

Respectfully Submitted,

SOLOMON LAW FIRM, P.L.L.C.

By: _____



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 3, 2022, a true and accurate copy of the foregoing was electronically filed with the Clerk's Office served using this Court's CM/ECF system, which will then serve a notice of electronic filing (NEF) on the Judge and the following:

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